JULE HOLD

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

TASLEEM KHAN,

Defendant.

INFORMATION

18 CRIM 139

COUNT ONE

(Wire Fraud)

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#:
DATE FILEB: 2 0 2018

The United States Attorney charges:

1. On or about June 3, 2017, in the Southern District of New York and elsewhere, TASLEEM KHAN, the defendant, willfully and knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, KHAN represented to an individual posting cellular phones for sale on Craigslist that he was an interested purchaser, but when KHAN met with the relevant individual, he impersonated a law enforcement officer and fraudulently obtained the cellular

phones through deceptions and verbal threats.

(Title 18, United States Code, Sections 1343 and 2.)

- 2. As a result of committing the offense alleged in Count One of this Indictment, TASLEEM KHAN, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense and the following specific property:
- a. Two cellular phones, to wit, an Apple iPhone 7 Plus and an Apple iPhone 7.

## Substitute Assets Provision

- 3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:
  - a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or depositedwith, a third person;
  - c. has been placed beyond the jurisdiction of the Court;
  - d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)

GEOFFREY S BERMAN

United States Attorney

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